

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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U.S. COMMODITY FUTURES TRADING COMMISSION, <i>et al.</i>	§	
	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO.
v.	§	3:20-CV-2910-L
	§	
TMTE, INC. a/k/a METALS.COM, CHASE METALS, INC., CHASE METALS, LLC, BARRICK CAPITAL, INC., LUCAS THOMAS ERB a/k/a LUCAS ASHER a/k/a LUKE ASHER, and SIMON BATASHVILI,	§	
	§	
Defendants,	§	
	§	
TOWER EQUITY, LLC,	§	
	§	
Relief Defendant.	§	
	§	

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**RECEIVER'S UNOPPOSED FIRST FEE APPLICATION**

Pursuant to the *Statutory Restraining Order* (“SRO”) entered by the Court on September 22, 2020, the Receiver is required to submit periodic fee petitions for authorization to pay fees and expenses of the receivership, with the first application due within 60 days of the entry of the Order. The Receiver has provided the U.S. Commodity Futures Trading Commission (the “CFTC”) and counsel for the Defendants Asher and Batashvili with a complete copy of the proposed Application, together with all exhibits and relevant billing information. The CFTC and Defendants are unopposed to the relief requested herein.

The Receiver’s First Fee Application covers the period from the inception of the Receivership on September 22, 2020 through October 24, 2020.

**I.**  
**FEES AND EXPENSES INCURRED**

**A. Receiver Fees & Expenses**

Fees. By this Application, the Receiver requests authority to pay **\$38,220** in Receiver fees, which is 80% of the total Receiver fees of \$47,775 incurred from September 22, 2020 through October 24, 2020. During this period, the Receiver provided 122.50 hours of service at his discounted hourly rate of \$395.00<sup>1</sup>. In addition to reducing his standard hourly billing rate, the Receiver also discounted his total fees by 20%. The valuable services provided by the Receiver during this time period are set forth in the invoices attached hereto as **Exhibit A**. The services are also summarized in the Receiver's Initial Report [Dkt. 181], filed on November 10, 2020.

Expenses. In addition, to assist the Receivership Estate, the Receiver incurred expenses in the amount of **\$1,807.21**. *See* Ex. A at 8. These are travel expenses for the initial trip from Dallas to Los Angeles for the initial seizure of assets from September 24, 2020 through September 26, 2020 and consist of airfare, hotel, rental car, and per diem.<sup>2</sup>

In sum, pursuant to the *SRO*, the Receiver seeks authority to pay a total of **\$40,027.21** in Receiver fees and expenses incurred from September 22, 2020 through October 24, 2020.

**B. Receiver's Counsel Fees and Expenses.**

Fees. The law firm of Scheef & Stone, L.L.P. ("Scheef & Stone") serves as primary counsel for the Receiver. Scheef & Stone submits monthly invoices to the Receiver for the services rendered. By this Application, the Receiver requests authority to pay Scheef & Stone **\$125,611** in fees, which is 85% of the total fees of \$147,778 billed by Scheef & Stone for the

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<sup>1</sup> Mr. Crawford's regular billing rate for non-receivership matters is \$450 per hour.

<sup>2</sup> The per diem of \$66 is the federal per diem rate for Los Angeles.

work performed from September 22, 2020 through October 24, 2020. Attached hereto as **Exhibit B** are Scheef & Stone's invoices for the period from September 22, 2020 through October 24, 2020.

The attorneys and paralegals of Scheef & Stone who provided services to the Receiver during this period, their billable rates, and the hours billed are summarized as follows:

Attorney/Paralegal	Hours Billed	Billable Rate	Total Billed
Peter Lewis (Partner)	110.90	\$435	\$48,241.50
James Stafford (Partner)	81.25	\$300	\$24,375
Mark Simon (Partner)	25.05	\$435	\$10,896.75
Jane Taber (Partner)	1.60	\$425	\$680
Brenda Neuwirt (Member)	1.25	\$325	\$406.25
Leslie Sanderson (Associate)	54.75	\$305	\$16,698.75
Priya K. Jesani (Associate)	53.25	\$270	\$14,377.50
Walker S. Young (Associate)	40.15	\$240	\$9,636
Margaret Shea (Associate)	21.40	\$200	\$4,280
Jessica Rolls (Associate)	8.50	\$200	\$1,700
Katherine Whitlock (Law Clerk)	14.90	\$200	\$2,980
Deb Baxter (Paralegal)	0.25	\$150	\$37.50
Will Hester (Paralegal)	57.75	\$125	\$7,218.75
Tiffany Hykoski (Paralegal)	50.00	\$125	\$6,250
TOTALS:	521	\$284 (blended rate)	\$147,778
After 15% Discount	521	\$241 (discounted blended rate)	\$125,611

Scheef & Stone provided valuable services to the Receiver during the period of September 22, 2020 through October 24, 2020. A description of these services is set forth in the invoices attached hereto as Exhibit B. The services are also summarized in the Receiver's Initial Report [Dkt. 181], filed on November 10, 2020.

Expenses. In addition, to assist the receivership estate, Scheef & Stone incurred expenses in the amount of **\$21,737.58** between September 22, 2020 and October 24, 2020. The expenses are set forth in detail in the invoices attached hereto as Exhibit B, but can be summarized as follows:

Filing fees in 94 federal district courts	\$4,418
Postage and delivery charges for filings in district courts	\$6,745.90
Insurance for vehicles seized by Receiver	\$1,572.08
Shipping files from Los Angeles to Receiver office	\$2,056.50
Travels expenses for Receiver's team during initial seizure	\$5,841.52

In sum, pursuant to the *SRO*, the Receiver seeks authority to pay Scheef & Stone a total of **\$147,348.58** in fees and expenses incurred from September 22, 2020 through October 24, 2020.

### **C. Receiver's Accountant Fees and Expenses.**

Fees. The accounting firm of Brandlin and Associates in Los Angeles, California serves as the accountant for the Receiver. By this Application, the Receiver requests authority to pay Brandlin and Associates **\$29,366.31** in fees for the work performed from September 22, 2020 through October 24, 2020. Brandlin and Associates discounted its fees by nearly 60%<sup>3</sup> from their standard hourly rates. Attached hereto as **Exhibit C** is Brandlin and Associates invoice for

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<sup>3</sup> Brandlin & Associates discounted its fees significantly in light of the logistical work, as opposed to accounting work, performed at the outset of the receivership assisting the Receiver in taking control of the Defendants' business premises and seizing personal property.

the period from September 22, 2020 through October 24, 2020. The fees are broken down as follows:

Accountant	Hours Billed	Billable Rate	Total Billed
Jeff Brandlin (accounting and supervisory work)	35.95	\$395	\$14,200.25
Jeff Brandlin (logistical work)	5.25	169.25	\$888.56
Gerardo Castellanos (accounting work)	25.05	\$250	\$6,262.50
Gerardo Castellanos (logistical support)	80.15	\$100	\$8,015.00
TOTALS:	150.40	\$195 (blended rate)	\$29,366.31

The accounting firm of Brandlin & Associates provided valuable services to the Receiver, which services are described on the invoice attached hereto as Exhibit C. In particular, because Brandlin & Associates has its office in Los Angeles, it provided a lot of logistical support to the Receiver during the seizure, assisted in seizing assets assuming control of the principal office of the Defendants, interviewing former employees, and reviewing QuickBooks for one of the entities. In addition, Brandlin & Associates assisted in determining the Defendants' payroll for their employees. Although Brandlin & Associates retained 10 individuals over the course of two days to move computers and office equipment out of the Defendants' offices and into storage, Brandlin & Associates did not charge the receivership for the time of these 10 workers. Brandlin & Associates is not seeking reimbursement of any expenses.

In sum, pursuant to the *SRO*, the Receiver seeks authority to pay Brandlin & Associates a total of \$29,366.31 in fees incurred from September 22, 2020 through October 24, 2020.

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Based on the foregoing, the Receiver believes the services rendered to the receivership by the Receiver, the Receiver's law firm Scheef & Stone, and the Receiver's accountants Brandlin & Associates. were valuable and that the rates charged to the receivership were fair and reasonable. Moreover, the expenses incurred for the receivership were reasonable and necessary. The attorneys for the CFTC previously reviewed the invoices of the Receiver, Scheef & Stone, and Brandlin & Associates and are \_\_\_\_\_ to the invoices being paid with the discounts being applied by the Receiver as set forth herein.

II.

**LEGAL DISCUSSION OF GUIDELINES FOR PAYMENT OF RECEIVERSHIP FEES AND EXPENSES**

In reviewing the total discounted fees of the Receiver, the Receiver's counsel, and the Receiver's accountants incurred, divided by the hours worked, the lodestar average rate per hour is \$243. In accordance with the law governing calculation of the lodestar rate, the lodestar rate for which approval is sought in this case is reasonable and does not merit any adjustment.

The "lodestar" method of evaluating the reasonableness of fees, which has been expressly approved by the Supreme Court, requires the court to look into the prevailing market rates in the relevant community and compare the prevalent rates with the average rate charged in the matter in issue. *Perdue v. Kenny*, 130 S.Ct. 1662, 1673 (2010). The lodestar method also includes most of the relevant factors constituting a "reasonable" fee, but does not rely expressly require the "subjective" *Johnson* factor analysis.<sup>4</sup> *Id.*

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<sup>4</sup> These *Johnson* factors are nevertheless addressed herein. *See infra.*

The Court calculates the lodestar by determining the number of hours reasonably expended by an appropriate hourly rate in the community.<sup>5</sup> *Louisiana Power & Light Co. v. Kellstrom*, 50 F.3d 319, 324 (5<sup>th</sup> Cir. 1995). In evaluating whether requested fees are reasonable, the court may use its own expertise and judgment to independently assess the value of an attorney's services. *Davis v. Bd. Of Sch. Comm'rs of Mobile County*, 526 F.2d 865, 868 (5<sup>th</sup> Cir. 1976). The Court also looks for evidence of "billing judgment," or the attorney or receiver's decision to discount or write off time that was unproductive or duplicative. *Saizan v. Delta Concrete Prods. Co.*, 448 F.3d 795, 799 (5<sup>th</sup> Cir. 2006). The amount of the award, and any reduction of the requested fee award, is within the trial court's discretion. *See, e.g., United States Football league v. National Football League*, 887 F.2d 408, 415 (2d Cir. 1989).

Additional considerations are also relevant in the context of an equity receivership. First, the agreement or opposition of the CFTC to the fee application is entitled to great weight. *See, e.g., SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F.Supp. 1220, 1222 (S.D.N.Y. 1973). Further, given the public service nature of equity receiverships, courts also consider the amounts recovered or other results obtained by the receiver in determining what constitutes a "reasonable fee." *SEC v. Goren*, 272 F.Supp.2d 202, 207 (E.D.N.Y. 003). Additionally, examination of reasonableness and necessity should take into account all circumstances surrounding the receivership. *See, SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 480 (S.D. Tex. 1974), *aff'd, SEC v. W.L. Moody & Co.*, 519 F.2d 1087 (5th Cir. 1975). The complexity and difficulty associated with the receivership are highly relevant factors in determining the reasonableness of professional fees. *See, SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973) (awarding interim fees and expenses to law firm for role in receivership and noting that it involved wide variety of complex legal matters requiring

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<sup>5</sup> The movant bears the burden of proving that the compensation requested is reasonable, and satisfaction of this burden requires that the movant present records from which the court may determine the nature of the work done, the need for it, and the amount of time reasonably required. *Louisiana Power*, 50 F.3d at 324.

the time, competence, and diverse resources of a law firm of high caliber). Further, Courts examine the credentials, experience, reputation, and other professional qualities required to carry out a court's orders when assessing the reasonableness of the rates charged for services to a receivership. *See, W.L. Moody & Co.*, 374 F. Supp. at 481 (holding that a court should give "considerable weight" to "a receiver's abilities, as required by the tasks of the receivership"); *see also, Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. at 1222 (fees awarded in full because they were based on law firm's usual hourly rate and supported by meticulous records)).

The Receiver submitted detailed descriptions of the matters on which services were expended, the number of hours billed by each professional, the rates charged by each, and the lodestar calculation for the fees submitted in this petition. Further, the Receiver's invoices and this petition demonstrate that billing judgment was exercised in the reduction of the standard rates charged by the Receiver and his firm<sup>6</sup>, and in discounting the total invoices of not only the Receiver, but also the invoices of the Receiver's law firm and the Receiver's accountants. Finally, the Receiver requests that the Court judicially notice the much higher hourly rates approved in other receiverships in Texas.<sup>7</sup>

The request for approval of the disbursements is also consistent with the "*Johnson factors*" set forth by the Fifth Circuit Court of Appeals in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5<sup>th</sup> Cir. 1974). Based on the lodestar calculation and the Johnson factors

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<sup>6</sup> The Receiver's standard hourly rate is \$450, but it is discounted for receivership work to \$390.

<sup>7</sup> *See, for example, Securities and Exchange Commission v. Correll*; Case No. 4:05-CV-472, in the United States District Court for the Eastern District of Texas, Sherman Division (approving Receiver fees of \$400 per hour and lead counsel fees of \$585 per hour); *SEC v. Amerifirst Funding, Inc., et al.*, Cause No. 3:07-CV-01188, Docket No. 117, in the United States District Court for the Northern District of Texas; Receiver's counsel's rates, discounted by 10–20% is \$420 per hour; *SEC v. W Financial Group, LLC, et al.*, Cause No. 3:08-CV-0499-N, Docket No. 65, in the United States District Court for the Northern District of Texas; Receiver's counsel's rate is \$510 per hour, and \$165 per hour for a law clerk; *CFTC v. Pousa*; Case No. 1:12-cv-00862 in the United States District Court for the Western District of Texas, Austin Division (approving Receiver fees in excess of \$600 per hour); and *Securities and Exchange Commission v. Stanford International Bank, Ltd., et al.*; Case No. 3:09-CV-0298-N, in the United States District Court for the Northern District of Texas, Dallas Division (approving Receiver fees of \$440 per hour and lead counsel fees of \$420 to \$500 per hour).

discussed above, the Receiver believes that the fees submitted are appropriate, just, and reasonable.

**A. The Time and Labor Required.** The Receiver respectfully directs the Court's attention to the foregoing summary schedule of unpaid fees and expenses, which identifies the total number of hours billed by the Receiver, the Receiver's attorneys and accountants (793.50 hours) from September 22, 2020 through October 24, 2020.

**B. The Novelty and Difficulty of the Questions.** Federal equity receiverships require extensive experience in order to act swiftly and efficiently in securing assets, obtaining documents and data to find additional assets, and to communicate with investors and law enforcement agencies. As set forth in Receiver's Initial Report filed with the Court and the detailed invoices attached hereto the Receiver and his personnel, on an expedited basis, executed the initial seizure of the business premises of the Defendants, taking control and possession of such premises; terminated the Individual Defendants from exercising authority over the entities they own and control; terminated Jones Day as the attorneys representing the Defendants; terminated the employees of the Defendants; entered the residences of the Individual Defendants and made an inventory of the personal property; seized vehicles; served the *SRO* on as many persons and entities that could be located as possibly holding assets to be turned over to the receivership; filed the *SRO* in all 94 federal district courts of the United States establishing nationwide jurisdiction for the receivership; filed notices of stay of civil litigation against the Defendants; notified regulators of the receivership and the effect of the receivership on pending regulatory matters; established a website for the investors; seized investor files and began creating a database of investors; numerous communications with investors; service of the *SRO* on the custodians of the Self-Directed IRAs used by the Defendants; service of the *SRO* on cloud platforms to gain access to the records of the Defendants and Relief Defendant; filed Notice of

Lis Pendens on numerous residential properties in Pennsylvania owned by the Relief Defendant; and investigating numerous entities owned and controlled by the Defendants and Relief Defendant.

**C. The Skill Requisite to Perform the Service.** The Receiver believes the services performed in this case to date required individuals possessing considerable experience in the administration of receiverships, claims processes, distribution plans, asset seizure, collection and litigation. The Receiver, Scheef & Stone, L.L.P., and Brandlin & Associates, for which disbursement approval is sought, have considerable experience in such areas.

**D. The Preclusion of Other Employment Due to Acceptance of the Case.** Neither the Receiver, Scheef & Stone, LLP, nor Brandlin & Associates declined any representation solely because of their services in this case, although the scope of the receivership is so broad that it requires substantially most of the Receiver's time.

**E. The Customary Fee.** The hourly rates sought herein for the Receiver and the Receiver's attorneys and accountants are *substantially* lower than the rates charged by other practitioners of similar experience levels in Texas. Indeed the per hour rates charged by the Receiver's counsel whose fees are included herein (ranging between \$200 – \$435 charged for attorneys) are \$100 to \$200 per hour lower than the rates charged on other receiverships pending in Texas.<sup>8</sup> The lodestar rate of \$243.00 per hour also demonstrates that when appropriate the Receiver is having work performed by less expensive attorneys or legal assistants.

**F. Whether the Fee is Fixed or Contingent.** The Receiver's fees and his counsel's fees are fixed insofar as monies exist by way of Receivership Assets from which to pay such fees, but payment of the fees and expenses is subject to approval by the Court.

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<sup>8</sup> See footnote 6, *supra*.

**G. Time Limitations Imposed by the Client or Other Circumstances.** The Receiver did not learn of the receivership until being asked to submit his CV two days prior to the SRO being entered. Within 24 hours after the SRO was entered on September 22, 2020 the Receiver assembled a team to travel to Los Angeles. The Receiver and his team conducted the initial seizure of assets the next day.

**H. The Amount Involved and the Results Obtained.** The fees for which payment is sought were for work summarized previously. The Receiver's attorneys and accountants contributed significantly to the Receiver's recovery of monies. The receivership account currently has a balance in excess of \$6 million. Receiver has also seized numerous assets consisting of real and personal property that remain to be liquidated.

**I. The Experience, Reputation and Ability of the Attorneys.** Scheef & Stone, the Receiver's primary counsel, include numerous attorneys who have experience in representing equity receivers in federal securities or commodities enforcement cases, and have done so for numerous years. The reputation of Scheef & Stone is recognized and respected in these fields. Mr. Crawford has served as a receiver in more than 12 federal court cases brought by either the CFTC or the Securities and Exchange Commission, with Scheef & Stone as Mr. Crawford's counsel.

**J. The Undesirability of the Case.** The representation of the Receiver incident to this case has not been undesirable.

**K. The Nature and Length of the Professional Relationship with the Client.** Scheef & Stone has represented the Receiver in numerous prior receiverships, including a receivership before this Court.<sup>9</sup>

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<sup>9</sup> See *Securities and Exchange Commission v. Alan Todd May and Prosper Oil & Gas, Inc*, Case No. 3:10-CV-0425-L in the United States District Court for the Northern District of Texas, Dallas Division.

**L. Awards in Similar Cases.** The Receiver believes the fees requested in this case for his counsel are less than or equal to those which have been awarded in similar cases in federal courts in Texas.

**III.  
CONCLUSION**

In conclusion, in accordance with the *SRO*, the Receiver represents that the fees and expenses included in this Application were incurred in the best interests of the Receivership Estate, and the Receiver requests authority for payment of such fees and expense.

Respectfully submitted November 19, 2020.

**RECEIVER KELLY M. CRAWFORD**

*/s/ Kelly M. Crawford*  
Kelly M. Crawford, Receiver  
State Bar No. 05030700

Scheef & Stone, LLP  
500 N. Akard Street, Suite 2700  
Dallas, Texas 75201  
Telephone: 214.706.4200  
Telecopier: 214.706.4242

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that this Motion and true and correct copies of the invoices that are exhibits to this Motion were provided to Richard Foelber and JohnMarc Buffa of the Plaintiff U.S. Commodity Futures Trading Commission, as representatives of the Plaintiffs, for review on November 16, 2020. In addition, on November 19, 2020 this Motion and true and correct copies of the invoices that are exhibits to this Motion were provided to Arnold Spencer, Esq., counsel for Defendants Lucas Asher and Simon Batashvili. Mr. Buffa indicated the U.S. Commodity Futures Trading Commission is unopposed to the relief sought. Mr. Spencer indicated Defendants Asher and Batashvili are unopposed to the relief sought.

*/s/ Kelly M. Crawford*  
KELLY M. CRAWFORD

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 20, 2020 I electronically filed the foregoing document with the clerk of the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court, and the electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record.

*/s/ Kelly M. Crawford*  
KELLY M. CRAWFORD

**EXHIBIT A**

**Receiver's Fees and Expenses**

**September 22, 2020 through October 24, 2020**

Scheef & Stone, L.L.P.  
500 N. Akard, Suite 2700  
Dallas, Texas 75201



## INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 09/26/2020  
Account No. 16125.101  
Invoice No. 991300

Matter 101 - Receiver

			Hours
09/22/2020	KMC	Telephone conference with CFTC regarding Court entering SRO appointing Kelly Crawford as Receiver; review SRO and Complaint; assemble receivership team for execution of receivership order in Los Angeles; formulate strategy; review information regarding each of individual defendants and begin investigation as to assets and business location.	3.00
09/23/2020	KMC	Prepare letter to SDIRA custodians revoking power of attorney of Defendants; prepare notice of removal of Simon and Lucas from control of Defendant Entities; prepare freeze letter to banks; prepare Warning sign to post on assets regarding receivership; prepare engagement agreements for Scheef & Stone as attorneys for Receiver and Brandlin and Associates as accountants for Receiver; communicate with CFTC regarding logistics and strategy of seizure of assets; communicate with East West bank regarding setting up receivership account; conference with Priya regarding preparing 754 notices to file in federal district courts; communicate with law enforcement regarding timing and logistics; travel from Dallas to Los Angeles.	12.00
09/24/2020	KMC	Communicate with law enforcement regarding strategy for accessing premises; access business premises and investigate assets, business entities, and documents; interview HR manager; prepare letter to Jones Day demanding return of unused retainer and requesting accounting of source of monies used for future representation, if any; conferences with process server regarding service of process at house of Simon upon Simon's wife; communicate with Simon's wife regarding need to make inventory of house contents and that assets are in receivership; telephone conference with attorney for Bayside Metals regarding receivership; telephone conference with Jones Day attorney regarding inspection of Simon's house; work on gaining access to the cloud for information of defendants; send out freeze letters; set up website for receivership; begin obtaining control of Barrett Capital website; multiple communications with CFTC and law enforcement and receivership team regarding securing assets pursuant to Receivership Order.	12.00
09/25/2020	KMC	Review documents and information at business premises; identify IT manager	

Kelly Crawford Receivership – Metals.com

09/26/2020

Account No: 16125-101

Invoice No: 991300

Matter 101 - Receiver

and work toward gaining access to cloud; telephone conference with CFTC and law enforcement about obtaining access to cloud; access home of Simon and make inventory of contents, interviewing Simon's wife; identify and secure Ferrari and make arrangements for removal from business premises; send notice of removal of individual defendants from entities to Jones Day attorney Mark Rassmussen; continue investigating and making inventory of assets, documents, and entities discovered; arrange for freeze letters to be sent to targets.

Hours

For Current Services Rendered	12.00	
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39.00	15,210.00
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## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Kelly M. Crawford	39.00	\$390.00	\$15,210.00

Total Current Services and Expenses	15,210.00
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Balance Due	<u>\$15,210.00</u>
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TERMS: Due and Payable Upon Receipt

Scheef & Stone, L.L.P.  
500 N. Akard, Suite 2700  
Dallas, Texas 75201



## INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 10/26/2020  
Account No. 16125.101  
Invoice No. 993864

Matter 101 - Receiver

			Hours
09/26/2020	KMC	Continue inventory of business premises and review of information; access premises of Defendant Lucas Asher and make inventory; facilitate removal of Ferrari from business premises; travel from Los Angeles to Dallas.	12.00
09/28/2020	KMC	Telephone conference with CFTC regarding status of receivership; telephone conference with Jones Day about its decision not to represent defendants; prepare letter to Jones Day terminating representation; telephone conference with Entrust and CFTC regarding SDIRA's and effect of receivership; conference with P. Lewis regarding attempt by L. Asher to sell Ferrari; send email to L. Asher warning him to comply with Court order; receive telephone call from L. Asher and leave voice mail message in response; conference with J. Stafford regarding handling other litigation against receivership defendants; conference with W. Young regarding handling calls from employees who need their personal property; work on website for receivership; prepare inventory of items to put in safe; have bank account opened.	5.00
09/29/2020	KMC	Prepare content for receivership website; communicate with investors; communicate with Entrust; prepare letter to attorney for Lucas Asher regarding source of funds; telephone conference with R. Foelber regarding injunction; telephone conference with M. Walters of US Attorney office; work on letter to bank with wire instructions for sending funds to receivership account; conference with P. Lewis regarding status of leases of homes by defendants.	3.00
09/30/2020	KMC	Telephone conference with CFTC regarding status of receivership; telephone conference with attorney for Asher; prepare list of personal property to be turned over by Asher; communicate with P. Lewis regarding communications with leasing company for Ferrari and Land Rover; prepare list of affiliated entities; conference with L. Sanderson regarding message to Minnesota investors about receivership not able to honor rescission; revise content for receivership website; telephone conference with Samara Mills regarding payments due to employees and conference with J. Stafford regarding same; communicate with W. Young about obtaining information from Tri-Net regarding employee payroll; communicate with J. Brandlin regarding granting	

Kelly Crawford Receivership – Metals.com

10/26/2020

Account No: 16125-101

Invoice No: 993864

Matter 101 - Receiver

			Hours
		access to former employees to retrieve personal items from space; begin putting together Preliminary Report to file with the Court.	5.00
10/01/2020	KMC	Telephone conference with CFTC regarding continuance of preliminary injunction hearing; communicate with counsel for defendants regarding consent to continuance of preliminary injunction hearing; prepare letter to former employees and begin emailing to former employees; review and revise content for receivership website and go live with website; revise letter to third parties who may be holding investments of defendants; telephone conference with FBI agent regarding entities owned or controlled by Defendants; prepare inventory of items for Simon Batashvili to turn over immediately and send to attorney for Simon Batashvili; communicate with P. Lewis regarding removal of items from Asher house he is renting; review communications with lessor of Asher house; telephone conference with J. Brandlin regarding same; work on retrieving Ferrari key; telephone conference with property manager for 8383 Wilshire regarding storage units leased by Defendants; telephone conference with J. Brandlin regarding same; send pictures to J. Brandlin of items to pick up from Asher house; telephone conference with car dealer regarding retrieval of Land Rover and contents of same.	4.75
10/02/2020	KMC	Telephone conference with CFTC regarding timing of injunction hearing and status of receivership; telephone conference with CFTC regarding status of obtaining information from banks from service of freeze order; communicate with L. Sanderson regarding serving letters upon banks demanding release of information about funds frozen and turnover of documents; coordinate with counsel for defendants and J. Brandlin turnover of Shelby Mustang.	2.50
10/04/2020	KMC	Review seized documents and add to list of affiliated entities and identify additional financial institutions to serve with the SRO; communicate with Wells Fargo regarding the SRO; prepare list of properties in which Tower Equity has an interest; telephone conference with J. Brandlin to confirm turnover of Shelby Mustang; communicate with defendants' attorney regarding turnover of vehicles.	2.50
10/05/2020	KMC	Telephone conference with CFTC and review and revise proposed language for carve out of expenses for defendants in Consent Order; telephone conference with First City Bank and provide wire instructions for transfer of funds to receivership account; work on list of affiliated entities in receivership and conference with P. Lewis regarding same; prepare letter to investors regarding receivership; coordinate with team calls from former employees and sending freeze letters to newly discovered targets.	3.00
10/06/2020	KMC	Multiple communications with Wells Fargo Bank and First City Bank regarding amounts frozen and turnover of funds; telephone conference with CFTC regarding Bayside metals and pending transactions; make request upon Bayside metals for accounting of transactions pending and completed transactions; review mail from Defendants and Relief Defendant and revise list of affiliated entities and send to CFTC; review and revise letter to Bank of America regarding status of accounts; revise list of real property; conference with W. Hester regarding spreadsheet of property in receivership; communicate with former employee regarding final pay and picking up personal belongings; telephone conference with J. Brandlin regarding getting	

Kelly Crawford Receivership – Metals.com

10/26/2020

Account No: 16125-101

Invoice No: 993864

Matter 101 - Receiver

			Hours
		information for final paycheck to employees.	4.00
10/07/2020	KMC	Conference with paralegals about preparing database of investors; receive and deposit check from First City Bank; telephone conference with attorneys with lawsuit pending against defendants; work on notice of stay to file in lawsuits; review regulatory action in Alaska and communicate with regulator regarding same; telephone conference with investor regarding status of account; communicate with Bayside metals regarding customer inquiry; communicate with Entrust regarding customer inquiry.	3.00
10/08/2020	KMC	Conference with CFTC regarding obtaining consent to Preliminary Injunction; communicate with former employees; communicate with investors; conference with M. Simon regarding [REDACTED]; review list of former employees and position and conference with M. Simon regarding [REDACTED]; revise Notice of Stay to file in pending lawsuits; telephone conference with court clerk regarding 754 filing; conference with L. Sanderson regarding letters to metal depositories; revise and finalize letters.	4.50
10/12/2020	KMC	Review affidavit from defendants regarding vehicles and send inquiry regarding same; communicate with counsel for defendants regarding access to quickbooks; communicate with J. Brandlin regarding same; conference with M. Simon and K. Whitlock regarding [REDACTED]; prepare outline of receivership strategy; begin work on motion and order establishing procedures for receivership and conference with P. Lewis regarding same; conference with J. Stafford regarding gaining access to cloud and strategy for same.	3.75
10/13/2020	KMC	Telephone conference with CFTC regarding Consent Orders and related issues; conference with P. Lewis regarding motion to establish procedures for receivership; conference with J. Stafford regarding regulatory hearing and obtaining access to cloud platforms; prepare draft of motion to hold Jeff Kohn in contempt for failing to turnover access to QuickBooks; communicate with J. Kohn regarding same; conference with Leslie regarding investor calls and questions of investors; conference with M. Simon regarding former employees.	2.00
10/14/2020	KMC	Meeting with team regarding delegation of duties and status of consent order; communicate with J. Brandlin regarding gaining access to QuickBooks for Chasemetals.com; make request of Defendants' attorneys to grant access to cloud platforms; respond to Defendants' attorney regarding attorney client privilege issue; provide total amount recovered to date from bank accounts to CFTC; revise letter to BOA and conference with L. Sanderson regarding same; telephone conference with Bayside Metals regarding unfilled orders; revise letter to [REDACTED] regarding freeze order; communicate with L. Sanderson regarding sending freeze order to [REDACTED] account; identify real property to file lis pendens on and send to P. Lewis.	5.50
10/15/2020	KMC	Work on getting letters out to investors; telephone conference with JonMarc regarding call with States on status of receivership; review motion regarding procedures for receivership; work on transferring [REDACTED]	1.50

Kelly Crawford Receivership – Metals.com

10/26/2020

Account No: 16125-101

Invoice No: 993864

Matter 101 - Receiver

			Hours
10/19/2020	KMC	Conference with P. Lewis regarding appraisal of watches; prepare motion to hold Bank of America in contempt; prepare declaration in support of motion for contempt; prepare proposed Show Cause Order as to Bank of America; prepare outline of status of receivership to share with State representatives; participate in conference call with State representatives regarding status of receivership; post copy of letter to investors on receivership website and send to State representative; telephone conference with J. Brandlin regarding vacating office premises, Ferrari, and gaining access to quickbooks; conference with J. Stafford regarding obtaining access to cloud; send consents to Defendants' attorney to execute; telephone conference with Defendants' attorney regarding gaining possession of Mercedes; conference with M. Simon and K. Whitlock regarding letters to terminated employees.	7.00
10/20/2020	KMC	Receive check from Wells Fargo and send to receivership bank for deposit; conference with P. Lewis regarding contempt motion against BOA; review mail of Defendants; communicate with J. Brandlin regarding removal of computers from office space; conference with landlord of Luke's house regarding keys to car and location of car; review and execute letters to former employee.	1.50
10/21/2020	KMC	Finalize Notice of Lis Pendens and send to W. Hester to finalize; conference with P. Lewis regarding same; attend to investor communications; confirm deposit of Wells Fargo bank and compare to documentation of amounts frozen; communicate with J. Stafford regarding making demands upon cloud providers; communicate with A. Spencer regarding consents from clients; communicate with P. Lewis regarding motion and order to file regarding establishing procedures in case; confirm Section 754 filings in other jurisdictions; communicate with W. Young regarding Tri-Net and regarding finding [REDACTED].	3.00
10/22/2020	KMC	Attend to investor calls; telephone conference with BOA; telephone conference with CFTC; communicate with team in Los Angeles regarding removal of computers from office; conference with P. Lewis regarding motion to establish procedures for receivership; communicate with defendant's attorneys regarding failure to comply with receivership order.	2.50
10/23/2020	KMC	Attend to investor calls; prepare contempt motion against individual defendants for failure to turn over list of entities they own or control; prepare declaration in support of motion; prepare proposed order for motion; conference with P. Lewis regarding filing same; communicate with counsel for defendants regarding same; telephone conference with CFTC regarding asset deposition of individual defendants; review revisions to motion to establish claims procedure and confer with P. Lewis regarding same; work on turnover of Mercedes; telephone conference with J. Brandlin regarding removal of computers from Wilshire office; receive and review documents regarding [REDACTED]; telephone conference with FBI regarding same and regarding intent to release office to landlord; send documents regarding [REDACTED] to FBI and to CFTC; telephone conference with attorney regarding procedures [REDACTED]; communicate with defendants' counsel regarding source of retainer.	5.50
10/24/2020	KMC	Attend to investor calls; telephone conference with investor; prepare letter to regulators regarding pending actions and receivership; prepare letter to	

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Invoice No: 993864

Matter 101 - Receiver

	Hours
regulators regarding settled matters; prepare letter to Samara Mills regarding nonpayment; communicate with employment attorney regarding sending letters to executives regarding nonpayment.	2.00
For Current Services Rendered	<u>83.50</u>
	<u>32,565.00</u>

Recapitulation	Hours	Hourly Rate	Total
Timekeeper			
Kelly M. Crawford	83.50	\$390.00	\$32,565.00

09/22/2020	Airfare Expense for trip to Los Angeles/ AMERICAN AIRLINES (KMC Firm CC)	414.20
09/26/2020	Rental Car for trip to Los Angeles / HERTZ (KMC Firm CC)	248.09
09/27/2020	Lodging Expenses - MARRIOTT/ (KMC Firm CC)	946.92
10/25/2020	Kelly Crawford Business meals - \$66 per diem X 3 Days	198.00
	Total Expenses	<u>1,807.21</u>
	Total Current Services and Expenses	34,372.21

TERMS: Due and Payable Upon Receipt

**EXHIBIT B**

**Fees and Expenses of Scheef & Stone, LLP**

**September 22, 2020 through October 24, 2020**

Scheef & Stone, L.L.P.  
500 N. Akard, Suite 2700  
Dallas, Texas 75201



## INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 09/26/2020  
Account No. 16125.102  
Invoice No. 993788

Matter 102 - Representation of Receiver

			Hours
09/23/2020	WLH	Conference with K. Crawford regarding receivership; prepare for seizure of assets; travel from Dallas to Los Angeles.	5.00
	WSY	Review of Complaint and Sealed Order granting Receivership authority; Travel to Los Angeles for Receivership assignment.	5.00
	LMS	Confer with Kelly Crawford regarding receivership; Brief review of complaint and SRO; Confer with Margaret Shea regarding assistance with bank communications	1.80
	PCL	Review CFTC Complaint and ex parte order granting receivership request and appointing K. Crawford as temporary receiver and follow up communications with K. Crawford, H. Hester and/or W. Young regarding receivership goals/strategy for inspection/inventory trip; travel to Los Angeles to conduct site reviews and inventory.	5.00
09/24/2020	WLH	Meet with Receiver and team to discuss approach to entry of Defendants' premises; travel to Simon Batashvili's residence to assist in locating for purposes of serving him with Order; travel to staging area and meet with FBI agents; travel to [REDACTED] to investigate business operating out of this office; enter Wilshire office and begin inventory of office space; assist Receiver with inventory of safe located in office.	10.00
	WSY	Meet with FBI entry team to coordinate responsive action; Initiate process of [REDACTED] from Receivership Entities' [REDACTED] [REDACTED] and by delivery of hold notice to [REDACTED] [REDACTED]; Initial intake of offices of Receivership Entities and review of correspondence, files, bank records, and legal notices in offices of Receivership Entities principals; Organization of those same files into corresponding groups for shipment back to Scheef & Stone Dallas office; Conference with Receivership team to plan next steps in collecting assets and documentation.	8.70
	LMS	Prepare to send letters to banks; Confer with Kelly Crawford regarding same; Create spreadsheet to capture bank information; Confer with Margaret Shea regarding bank communications; Send letter to TriNet HR	2.50
	PCL	Continue review of CFTC complaint and/or ex parte receivership order, meet with and numerous communications with K. Crawford, W. Young, J. Stafford	

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09/26/2020

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Invoice No: 993788

Matter 102 - Representation of Receiver

		Hours
	and/or W. Hester regarding site review and inventory, trip to meet with FBI team prior to 8383 Wilshire take down; trip to S. Batashvili's house to review and inspect 224 Conroy residence and related conference with F. MacCarthy outside of home( S. Batash's wife) and K. Crawford to advise her of receivership order, obligations thereunder and obligation to inspect residence( Ms MacCarthy refused to allow inspection); inspection of 8383 Wilshire office and begin inventor/review of contents of same(4.8);related research regarding L. Asher's residence and S. Batash's residence and search for vehicles owned by each.	12.00
JSS	Strategy Meetings with Receiver and Team discussing law enforcement's seizure and pre-planning for inventory (3 hrs); review complaint and order (1 hr); travel to and initial inventory of Defendants' business headquarters (5 hrs); travel to [REDACTED] to deliver notice of Receivership order (1 hr); research [REDACTED] [REDACTED] of Defendants' [REDACTED] and draft demand letters to [REDACTED] [REDACTED] controllers (2 hrs).	12.00
09/25/2020	WLH Travel to Batashvili's residence for [REDACTED]; meet with Receiver and P. Lewis at Batashvili's residence for purpose of walking the house and preparing inventory of contents; travel to 8383 Wilshire office; continue to conduct inventory at Suite 700; made video inventory of Suite 74; work with building management to have locks changed in both suites.	10.00
WSY	Interview Controller of Receivership Entities, Dennis Bleminchenko (1.5); Inventory of all 145 computer systems and serial number and model information and entry of that data into a spreadsheet (4); Continued review of Receivership Entities' principals pertinent documents and review of pertinent documents in offices of Controller, Marketing and Sales managers, and Human Resources manager (1.5); Interview Information Technology official Eduardo Alvarado (1); Strategize and implement plan to ensure safekeeping of Receivership Entities' Ferrari (2).	10.00
LMS	Prepare and send freeze letter to [REDACTED]; Prepare and send freeze letter to [REDACTED]; Telephone calls to banks to obtain information regarding where to send letters; Confer with Kelly Crawford regarding same	2.80
PKJ	Review Complaint; Review Order appointing receiver; prepare notices of appointment of receiver; prepare letter to clerk to be included with notice for filing of miscellaneous action; review court rules to determine filing fees for miscellaneous actions in US District Courts; Review 28 U.S.C. Sec. 754 to determine filing requirements.	4.30
PCL	Email and/or phone communications and/or conferences with K. Crawford and K. Pergram of 8383 Wilshire Building management office regarding securing copy of lease documents for Tower Equity premises, location of additional offices, restriction of access to receivership premises and related review of lease documents; CFTC Receivership- meetings and numerous communications with K. Crawford, W. Young, J. Stafford and/or W. Hester regarding receivership site review and inventory strategy/ information obtained and/or needed; research regarding 10134 Angelo View Drive ( L. Asher's residence), trip to same with K. Crawford, limited site review and inventory as well as interview of two inhabitants of site; continue final site review and clean up at 8383 Wilshire Drive office building and organization of materials to be shipped back to Dallas; travel back to Dallas.	10.00
JSS	Lead interview of Dennis Bleminchenko (Defendants controller) along with Walker Young; draft summary of interview for Receiver and post interview meeting with Walker Young; conduct analysis of computer systems to	10.00

Kelly Crawford Receivership – Metals.com

09/26/2020

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Invoice No: 993788

Matter 102 - Representation of Receiver

	Hours
determine location of documents; phone conference with Receiver and team discussing status of investigations and inventory of offices; continue inventory of offices; numerous calls and text messages to Eduardo Alverado (Defendants' IT manager); interview Eduardo Alverado; draft demand letters to [REDACTED]; travel to Dallas.	10.00
For Current Services Rendered	<u>109.10</u>
	30,484.50

Recapitulation			
Timekeeper	Hours	Hourly Rate	Total
Priya K. Jesani	4.30	\$270.00	\$1,161.00
Walker S. Young	23.70	240.00	5,688.00
Will Hester	25.00	125.00	3,125.00
Leslie Sanderson	7.10	305.00	2,165.50
James Stafford	22.00	300.00	6,600.00
Peter Lewis	27.00	435.00	11,745.00
 Total Current Services and Expenses			30,484.50
 Balance Due			<u>\$30,484.50</u>

TERMS: Due and Payable Upon Receipt

Scheef & Stone, L.L.P.  
500 N. Akard, Suite 2700  
Dallas, Texas 75201



## INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 11/16/2020  
Account No. 16125.102  
Invoice No. 993890

Matter 102 - Representation of Receiver

			Hours
09/26/2020	JSS	Continue inventory of Defendants' offices, discovering [REDACTED] [REDACTED] information, additional entities and [REDACTED] [REDACTED] regarding [REDACTED] (4hrs); phone conference with Receiver regarding investigation of Defendants' rental home (.50); research legal departments and draft demand letters to [REDACTED] and [REDACTED] (1 hr); meetings with team to discuss relevant documents to pack and ship and execute same (2.25 hrs); travel from Los Angeles to Dallas (4.25).	12.00
	PCL	Travel to and from 101 Angelos View Drive residence of L. Asher, review and inventory contents of same, interview of occupants regarding contents, access to garage and location of keys to MB G 63 parked in driveway, assisted in posting premises with Receivership signs, email and/or phone communications with K. Crawford regarding same and next steps to secure premises and research regarding owner/status of subject residence (3.50) Various communications with and assist K. Crawford, J. Stafford, W. Hester and/or W. Young regarding completion of inventory at 8383 Wilshire and boxing of documents and articles removed from 8383 Wilshire, S. Batashvili's and/or L. Asher's residences, assist in organization and cleanup of premises in order to secure same (2.5); resend of email communications to Cindy at Ilusso transmitting Ex Parte Order and following up on Ferrari issues and related file review(.25); communications with J. Chin regarding security for Ferrari(.25) return to Dallas from Los Angeles (4.25).	10.75
	WLH	Box investor files and other documents and send to office of Scheef & Stone; teleconference with Wyatt regarding storing the 2017 Ferrari 488; teleconference with Beverly Hills Ferrari regarding transporting the Ferrari; telephone conference with transport service regarding moving Ferrari to [REDACTED]; meet with transport service for securing Ferrari; flight from Los Angeles to Dallas.	12.00
09/28/2020	WSY	Interview [REDACTED], [REDACTED] for Metals.com, and take notes on the same for Kelly Crawford's review.	0.30
	PKJ	Work on getting the Notices of Appointment of Receiver filed pursuant to 28 USC 754 in all US District Courts, including preparing revised notices, preparing cover letters to all Districts, contacting all District Courts to find out	

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Matter 102 - Representation of Receiver

			Hours
		procedure for opening/filing miscellaneous matter, and compiling and assembling packet to be sent to each District Court including Notice and exhibits attached thereto.	11.00
	JSS	Finalize demand letters to the Secretary of State of Texas for service on domain controllers and IT companies affiliated with Defendants 1(hr); receive correspondence from Defendants former counsel at Jones Day regarding pending litigation (.50); meeting with Receiver regarding same on strategy for response (.60).	2.10
	LMS	Prepare correspondence to [REDACTED]; Confer with Receiver regarding investor communications	1.00
	PCL	Research regarding L. Asher, S Batashvili, additional entities, assets, etc. and related communications with K. Crawford, J. Stafford, W. Young, W. Hester; Email and/or phone\ Communications with K. Kassan regarding Ferrari sale offer received and lease or purchase status of Ferrari; email and/or phone communications with C. Gibbs, K. Kassan, D. Gath, W. Hester and K. Crawford regarding Ferrari/ receivership status and lease questions/ issues; email and phone Communications with J. Moscatello at Luxury Leasing regarding receivership and vehicles purchase or lease status/questions for Ferrari and other vehicles; communications with W. Hester regarding research needed for various vehicles; communications with K. Crawford regarding phone call/ message from L. Asher.	4.75
09/29/2020	PKJ	Continued working on getting the Notices of Appointment of Receiver filed pursuant to 28 USC 754 in all District Courts, including preparing cover letters to remaining District Courts, contacting all District Courts to find out procedure for opening/filing miscellaneous matter, and compiling and assembling packet to be sent to each District Court including Notice and exhibits attached thereto.	9.50
	JSS	E-mail correspondence and telephone conference with counsel of Jones Day regarding representation on several open litigation matters (1hr); receipt and review pleadings from Jones Day counsel in light of same (.50); communications with Receiver in light of same (.50); respond to email communications from Colorado AG's office and review pleadings received in light of same (.80); receive and respond to communications from counsel for Godaddy (.50); email communications with counsel for Microsoft (.50).	3.70
	LMS	Return calls to investors; Prepare call notes regarding same	1.00
	PCL	Continue ownership research for Asher Beverly Hills residence , left voicemail for P. Kohannin regarding ownership issues, (.75); review K. Crawford assignment list(.25);extensive email and /or phone communications with D. Saville regarding Asher Beverly Hill residence ownership/ receivership order and status, D.Saville conversations with L. Asher, lease copy, receivership posting of house, etc. and draft follow up/status emails to K. Crawford, D. Saville, W. Hester et al., regarding same( 2.50); communications with K. Crawford and/or S. Richman regarding S. Batashvili's house lease , receipt and review of same and email and phone communications with S. Richman regarding receivership/house status and issues(1.5).	5.00
	WLH	Teleconference with management of Wilshire office regarding delivery of packages being made to management office instead of office suite of defendants and retrieval of packages; conference with Receiver regarding	

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Matter 102 - Representation of Receiver

			Hours
		giving building management access to premises to treat restroom pipes with pest control; contact GEICO to determine status of insurance coverage on Ferrari; conference with Receiver regarding status of insurance coverage; communicate with Wyatt regarding insurance coverage.	3.00
09/30/2020	WSY	Interview Sales Associate of metals.com, [REDACTED] (.3); Coordinate with former employees of metals.com and associated Receivership entities and Jeff Brandlin, of Brandlin & Associates, for removal of personal effects (.4); Confer with Tri Net human resources service concerning payroll issues and data for metals.com (.3).	1.00
	JSS	Communications with Jones Day counsel regarding arbitration matter and former employee [REDACTED] (.60); phone conference with [REDACTED] [REDACTED] (.50); phone conference with Microsoft counsel and subsequent email communications regarding same (.70); review proposed waiver of litigation from Colorado AG's office and request additional evidence in light of unknown but alleged Defendant entity (.80); phone conference with assistant Colorado AG (.50); correspondence with godaddy in response to request for additional information for domain control (.50); receive and review letter from counsel for dropbox (.30).	3.90
	MKS	Confer with L. Sanderson regarding identifying defendant's investors in preparation to send letters; research [REDACTED] [REDACTED].	2.70
	WSY	Confer with Kelly Crawford regarding response to TriNet (human resources company for Receivership entities) relating to access to records and payroll issues (.1); Draft response and send to Kelly Crawford for his review (.3); Confer with controller, Dennis Blemichenko, and coordinate with Jeff Brandlin regarding retrieval of employees' personal affects (.4);	0.80
	PKJ	Research Electronic Communications Privacy Act; review Receivership Order and research whether Receivership Order protects cooperating entity from violating the Electronic Communications Privacy Act; create and update spreadsheet to track filing of Notices of Appointment of Receiver pursuant to 28 USC 754; contact various District Courts to confirm filing of 754 Notices.	5.80
	LMS	Draft response template to financial institutions; Multiple email correspondence; Attempt follow up communications with financial institutions	4.80
	PCL	Receipt and review of Asher lease for Beverly Hills residence and email and/or phone communications with D. Saville, K. Crawford regarding keeping property secured and lease terms; email and/or phone communications with S. Richman and K. Crawford regarding Beverly Hills residence for S. Batashvili; Communications with K. Crawford regarding Asher cooperation regarding Ferrari (but is not sure where key is located) and related email and/or phone communications with H. Readshaw and K. Crawford regarding Luxury Lease documents and interest in Land Rover and Ferrari, securing of Ferrari, key location and related review of documents received from Luxury Leasing; communications with W. Young, K. Crawford, K. Stafford regarding employee payroll inquiries; Email/and/or phone communications with K. Crawford and/or A. Spencer regarding property list; Continue research into L.Asher, S. Batashvili's assets and related communications with K. Crawford, L. Sanderson regarding same; Review entity/ names lists and email communications with K. Crawford regarding	

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Matter 102 - Representation of Receiver

			Hours
		same and related research(.50); Review Batashvili Ferrari file and related research; review Mountain Motors insurance policy related to storage of Ferrari and email communications with W. Hester and K. Crawford regarding same.	4.00
10/01/2020	JSS	E-mail communications with counsel for Dropbox (.50); confer with Receiver regarding response to same; revise/edit receivership website (.20).	0.70
	MKS	Continue researching mailing addresses and fax numbers of business entities defendant invested in and begin drafting letters to those entities.	5.50
	LMS	Revise freeze letter to business entities regarding ownership interests of receivership defendants; Confer with M. Shea regarding same	1.00
	PKJ	Communications with various District Courts for purpose of confirming receipt and filing of 754 Notice.	1.20
	MHS	Communications with Receiver regarding former employees employment issues.	0.25
	PCL	Email communications with H. Readshaw,A.Bush and K. Crawford regarding Luxury Leasing insurance for Land Rover and Ferrari and related status/repossession for Land Rover inquiries; Communications with K. Crawford and A. Spencer regarding asset information needed; Review Asher Beverly Hills lease and email communications with D. Saville and K. Crawford regarding Saville's obligations under receivership orders and items to be secured and preserved; communications with K. Crawford, W. Young and J. Brandlin regarding Ferrari key and storage; review of individual defendants' motion to continue and related email communications with K. Crawford et al. regarding same and related docket review; Communications with Asher residence and personal property issues; communications with K. Crawford and M. Simon regarding employee issues; review inventory list and related communications with W. Hester and K. Crawford regarding same; communications with K. Crawford and/or J. Brandlin regarding items to be picked up from Asher residence; email and/or phone communications with H. Readshaw regarding [REDACTED]	3.50
	WLH	Review videos and photographs of Batashvili home and create inventory matrix; research owner of residence at 5809 Waverly Drive by using Los Angeles County Tax Appraiser site; email LA County Tax Assessor and request information on owner of address.	5.00
10/02/2020	MHS	Email from Kelly Crawford regarding health insurance issue; issue for terminated employee; analyze and respond to same.	0.50
	MKS	Edit letters in preparation to send to business entities with copy of order; email and fax letters with copy of order to business entities.	1.90
	WSY	Field several calls from former employees and take notes accordingly concerning pay issues, retrieval of personal effects, and experience with the Receivership entities (1); Continue work on inventory of items found at Receivership Entities' office, including the televisions and computers found there (.5).	1.50
	LMS	Prepare and send freeze letters to multiple financial institutions	2.50
	PCL	Communications with A. Spencer, R. Foelber and JH Buffa regarding	

Kelly Crawford Receivership – Metals.com

11/16/2020  
Account No: 16125-102  
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Matter 102 - Representation of Receiver

			Hours
		turnover, etc of assets(.25) communications with K. Crawford regarding status of vehicles owned by Batashvili and related research(.50).	0.75
10/03/2020	LMS	Email correspondence to representatives of financial institutions regarding response to freeze letters	0.80
10/05/2020	JSS	Telephone conference with former employee Dennis B. regarding conversations with Tri-Net for payroll (.30); telephone conference with former employer Eduardo A. regarding information needed to obtain dropbox account information (.30); telephone conference with counsel for dropbox (.60); review order and dropbox letter, including legal citations and prepare written response in light of same (.90).	2.10
	MKS	Confer with L. Sanderson regarding contacting additional business entities and sending orders; research contact information in preparation to serve letter and order.	0.30
	LMS	Prepare letters to financial institutions; Return calls to multiple investors	4.00
	PCL	Communications with K. Crawford and A. Spencer regarding vehicles issues and status; Email and/or phone communications with D. Saville regarding personal property at Simon's residence; Review and revise entity list, communications with K. Crawford regarding same and related research; Research regarding G. Norris law firm and related email and/or phone conversations with G. Norris regarding various entities created for individual defendants, receivership status and related information needed; communications with K. Crawford regarding MB G 63 status, related file review and follow up communications with H. Readshaw regarding same; email and/or phone communications with Natalie at Fred Stahl insurance regarding Ferrari issues; email and/or phone communications with S. Richman regarding status of receivership, transmittal of latest order related issues(.5); draft and file Notice of Appearance.	4.00
	WSY	Confer with corporate counsel for Receivership Entities' human resources' company (.3); Confer with employees of Receivership Entities regarding payment due to them, retrieval of personal possessions, and general interview (1.4).	1.70
10/06/2020	JSS	Attention to e-mail from P. Lewis regarding update to discovery of additional entity and actions relating to same.	0.10
	JSS	Telephone conference with [REDACTED] and [REDACTED] to Receiver's website.	1.50
	WSY	Confer with Jeff Brandlin's associates regarding the coordination of mail retrieval (.1); Confer with counsel for TriNet regarding necessary information for related entities (.2); Confer with attorneys for Receiver concerning outstanding issues and need for research related to penalties for failure to comply with Court Order (.2).	0.50
	MKS	Confer with L. Sanderson regarding letters emailed to business entities last week.	0.20
	LMS	Send SRO to [REDACTED] Bank; Confer with Peter Lewis and Receiver regarding communications with [REDACTED]; Draft bank letters	3.20
	PCL	Phone and/or email communications with R. Spears, K., Crawford, L.	

Kelly Crawford Receivership – Metals.com

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Matter 102 - Representation of Receiver

		Hours
	Sanderson, et al., regarding [REDACTED] nexus with receivership entities and related research (1.75); communications with W. Young and K. Crawford regarding research needed on potential contempt damages questions (.50); review entities list and related communications with K. Crawford, et al., regarding same(.25); communications with K. Crawford regarding [REDACTED] account turnover(.25).	2.75
	WLH Review email from LA County Tax Assessor regarding 5809 Waverly property and forward to Receiver; review videos of Defendants' offices at 8383 Wilshire, Suite 700 and 742 for purpose of adding to inventory matrix; telephone conference with Carter Deel regarding appraisal of Patek Philippe watches.	5.00
10/07/2020	JSS Communications with Microsoft Counsel regarding access to Defendants' e-mail accounts (.20); communications with former employee Dennis B. regarding communications with Tri-Net and pay issue (.20); telephone conference with K. Crawford regarding status of access to cloud storage companies (.20).	0.60
	JSS Research Network Solutions.com to determine [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]; confer with [REDACTED] [REDACTED] regarding same; draft demand letter in light of same.	0.90
	JSS Research parent company of QuickBooks and Registered Agent of same (Intuit) to effectuate service of process on Intuit for demand for access to online accounts; draft demand letter in light of same.	0.70
	MKS Correspondence with business entity regarding receivership order and the entities owned or controlled by receivership defendants.	0.30
	JSS Draft Notice of Stay in Langmore Capital v. TMTE, Inc., et al; research California notice of stay procedures in light of same.	1.20
	WSY Confer with employees of Receivership Entities to troubleshoot issues regarding final paychecks and recovery of personal items (.5); Research regarding sanctions remedies and other penalties for entities that do not comply with the Court's Order granting the Receiver the power to collect information (1.3).	1.80
	LMS Correspondence with financial institutions; Confer with Receiver regarding same	1.30
	TH Review client files and prepare database of client information for use in receivership.	7.00
	PCL Research regarding and communications with [REDACTED] regarding receivership orders and information needed regarding vehicle status/information needed; phone and email communications with D. Spitzer and K. Crawford regarding representation of defendant entities and information needed and/or provided and related file review/research; communications with K. Crawford regarding additional entities list; Review letter to M. Rasmussen at Jones Day regarding Due Diligence obligations; Communications with P. Choi, general counsel for [REDACTED] regarding receivership status and vehicles information needed for certain defendant vehicles and related research; communications with K. Crawford and K. Goldman regarding employees classification lawsuit and related file	

Kelly Crawford Receivership – Metals.com

11/16/2020

Account No: 16125-102  
Invoice No: 993890

Matter 102 - Representation of Receiver

			Hours
		review/reseach; communications with K. Crawford, J. Stafford, et al regarding notice of stay preparation and/or filing; review revised entities list and related communications with K. Crawford regarding same.	4.75
10/08/2020	MHS	Review communications from employees regarding wages; conference with Kelly Crawford regarding same; telephone conference with investor [REDACTED] [REDACTED] regarding his seeking information regarding receivership; conference with Kelly Crawford regarding payment to employees [REDACTED] [REDACTED] activity and need to obtain job [REDACTED].	0.90
	MKS	Call business entities to determine legal department fax number or email; fax letter to business entities with copy of the receivership order and order extending the same.	0.60
	JSS	Review and analysis of letter from Google objecting to Receiver's request for information.	0.60
	JSS	Telephone conference with Massachusetts AG's office regarding claims against TMTE.	0.60
	JSS	Prepare notices of stay; confer with Receiver and P. Lewis regarding same.	0.40
	JSS	Receive and prepare response to objection letter from Dropbox; review SCA and privacy statutes, including relevant case law in light of same.	2.20
	JSS	Communications with GoDaddy regarding additional domains to secure and redirect.	0.30
	LMS	Prepare letters to [REDACTED] [REDACTED] Return calls to investors; Confer with with Receiver regarding same	2.80
	PKJ	Telephone call to Judge Africk's court in the Eastern District of Louisiana to respond to questions regarding miscellaneous filing.	0.20
	TH	Review client files and prepare database of client information for use in receivership.	7.50
	PCL	Communications with K. Crawford, L. Sanderson and R. Spears regarding [REDACTED] response and related file review; draft notice of stay and related communications with K. Crawford and J. Stafford regarding same; communications with K. Pergrem and K. Crawford regarding 8383 Wilshire rent inquiry; communications with K. Crawford regarding consent order status; communications with A. Spence and K Crawford regarding asset deposition.	1.25
10/09/2020	JSS	Telephone conference with and draft demand letter to Jeff Cohn, former independent CPA for receivership defendants.	1.00
	JSS	Telephone conference with Microsoft counsel regarding its request for additional specific language to be added to the Receivership Order; review the ECPA in light of arguments made by Microsoft.	1.10
	MHS	Review company policy manual; attention to California law regarding benefits; preparation for and calls to employees regarding compensation and employment.	4.20
	MKS	Call with legal department of business entity regarding receivership order; draft and email letter with order to the business entity's legal department.	0.50
	WSY	Coordinate with former employees on retrieval of personal effects from Receivership Entities' office, conduct their interviews, and discuss issues related to final pay.	0.60

Kelly Crawford Receivership – Metals.com

11/16/2020  
Account No: 16125-102  
Invoice No: 993890

## Matter 102 - Representation of Receiver

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Matter 102 - Representation of Receiver

			Hours
		conference with former employee [REDACTED] regarding use of his email account; review/analysis [REDACTED] regarding objections raised by Microsoft.	2.20
PKJ		For purposes of filing Sec. 759 notice; review local rules in Eastern District of Louisiana regarding attorney admission for purpose of preparing pro hac vice motion and required attachments to same; find local counsel in Eastern District of Louisiana to assist with pro hac vice admission for Kelly Crawford; prepare pro hac vice motion and declaration of Kelly Crawford to be attached to same.	1.75
TH		Review client files and prepare database of client information for use in receivership.	7.50
JCT		Assist in Louisiana counsel process for getting information to counsel; coordinate names of attorneys with Priya Jesani; email discussions with Louisiana counsel and review responses; connect with counsel and coordinate process with Ms. Jesani on engagement and next steps.	1.20
PCL		Communications with K. Crawford, J. Stafford regarding filing of stay notices; communications with K. Crawford and M. Simon regarding former employees pay issue; review of W. Young research on contempt damages; Communications with Natalie at State Farm regarding status of 2012 Ferrari vehicle; communications with K. Crawford regarding submission of Consent Orders to Judge Lindsay; communications with K. Crawford regarding of motion to establish procedures.	2.00
10/13/2020	JSS	Review email from former employee [REDACTED]; draft e-mail to M. Simon regarding same to resolve pay issues.	0.30
	MKS	Correspondence with investment business entities regarding freeze order.	0.40
	MHS	Emails from [REDACTED], [REDACTED], and [REDACTED] regarding payment issues and responding to same; telephone calls to former employees regarding compensation and job duties; research [REDACTED] [REDACTED]; meeting with Receiver Kelly Crawford regarding pursuing return of compensation related to commissions, investigation by CFTC, and actions to be taken.	4.30
	WSY	Confer with Receiver Kelly Crawford regarding strategy for certain aspects of Receivership Entities' compensation and response to certain non-compliance issues with Receivership Entities' human resources provider (.6); Confer with former employee of Receivership Entity who discontinued employment prior to Receivership action (.2).	0.80
	JSS	Confer with Receiver regarding contempt motion in light of Mr. Kohn's (d's former outsource cpa) refusal to give Receiver's accountant's access to D's QuickBooks' records.	0.50
	JSS	Multiple conferences and email communications with Microsoft's counsel regarding access to D's email accounts; confer with D's former IT employee regarding same.	0.75
	JSS	E-mail communication with GoDaddy regarding access to [REDACTED] and preservation of websites set to expire to preserve evidence.	0.25
	TH	Review client files and prepare database of client information for use in	

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			Hours
		receivership.	5.50
	LMS	Return calls to investors; draft letter to Bank of America General Counsel; Assemble exhibits for letter; Confer with Receiver regarding letter contents	3.75
	PKJ	Revise declaration of Kelly Crawford to be attached to Motion for Pro Hac Vice admission in Eastern District of Louisiana based on Kelly's state and federal bar admission information; follow up telephone calls to additional District courts that we have not received the file stamped copy of Notice of Appointment of Receiver from;	1.00
	PCL	Communications with J. Stafford and K. Crawford regarding QuickBooks access issues.	0.25
10/14/2020	JSS	Review e-mail from Receiver regarding assignment of tasks and direction toward procedural posture in light of entry of agreed consent order; conference with Receiver and Legal team regarding status of case, proposed entry of order and assignment of tasks to accomplish direction of order.	1.50
	MHS	Attend meeting chaired by Receiver regarding strategy, issues, and assignments; telephone conference with former employees regarding compensation; drafting and editing memorandum to Receiver regarding employment issues.	2.00
	MKS	Attend zoom meeting regarding status of case; research contact information for various business entities to send freeze letters; draft letter to liquidate assets to send with Order.	2.30
	JSS	Phone conference with counsel for microsoft; draft consent declaration for defendants to consent to transfer of microsoft accounts; email update to Receiver regarding same.	1.50
	WSY	Participate in conference call with Receiver and other members of the Receiver's team (.9); Confer with former employees regarding retrieval of personal effects and pay issues (1); Email correspondence with TriNet counsel regarding items not provided (.35).	2.25
	TH	Review client files and prepare database of client information for use in receivership.	7.50
	LMS	Conference call with Receiver and Receiver's counsel regarding entry of consent order and status of receivership, responsibilities, and action items; return calls to investors	2.00
	PKJ	Communication with local counsel in Eastern District of Louisiana for purpose of assisting us with filing motion for pro hac vice admission; continued contacting District Courts that still have outstanding Notices of Appointment of Receiver that we have not received confirmation of filing from.	1.25
	PCL	Strategy meeting with K. Crawford, J. Stafford, et al.; draft motion to approve administrative procedures and related file review.	3.50
	KEW	Legal research regarding [REDACTED]; status meeting with Receiver.	1.00
10/15/2020	JLR	Perform LA County court records research necessary to locate the case specific information needed to complete the Superior Court of California, County of Los Angeles Notice of Stay of Proceedings; Complete the aforementioned Notice of Stay of Proceedings for two pending civil cases.	3.25
	MHS	Review and analyze Consent Order; work on memorandum to Receiver	

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			Hours
	regarding employee issues.		2.00
MKS	Send freeze letter and copy of Receivership Order and Order extending the same to business entity possessing or controlling assets owned by Receivership Defendants; research share transfers of certain stock; read Consent Order to business entities.		1.50
JLR	Revise portion of the Notice of Receivership and Related Stay to include and attach the Texas Federal Court Consent Order as to Individuals; Revise the County of Los Angeles Notice of Stay of Proceedings Forms per J. Stafford comments.		1.50
TH	Review client files and prepare database of client information for use in receivership.		7.50
LMS	Review messages and return calls to investors		2.50
JCT	Follow up with Priya Jesani on Louisiana pro hac vice admission and coordination with Louisiana counsel.		0.40
PCL	Communications with K. Crawford and D. Spitzer regarding representation/due diligence issues and status as well as information needed and related file review; communications with J. Stafford regarding stay notices; communications with K. Crawford and/or K. Pergram regarding receivership orders/ 8383 Wilshire landlord/auction/ rent issues and questions; revise administration motion and/or order thereon, transmit to CFTC counsel for comment and related communications with K. Crawford regarding same; communications with H. Readshaw and K. Crawford regarding Land Rover [REDACTED] keys for Ferrari/Land Rover, ownership/lease documents and loss information for MB and related file review.		4.25
PCL	Communications with H. Readshaw and K. Crawford regarding Land Rover contents, keys for Ferrari/Land Rover, ownership/lease documents and loss information for MB and related file review.		1.00
10/16/2020	JSS	Draft and File Notice of Appearance and Receivership in Alaska SEC matter.	1.50
	MKS	Review individual consent order; research contact information for business entities controlling assets in preparation to send additional freeze letters.	2.00
	JSS	Review and finalize motions to stay in California matters.	1.50
	JLR	Prepare County of Los Angeles Notice of Stay of Proceedings Form, Notice of Receivership and Related Stay Pleadings, and Docket/Order Exhibits for two civil cases pending in Los Angeles County, California.	1.00
	WSY	Correspondence with counsel for TriNet, the outsourced human resources firm employed by Receivership entities, and review of the items provided by TriNet.	0.70
	MHS	Communication with various former employees regarding duties and responsibilities; review, revise and edit memorandum to Receiver regarding employee issues; communication with Receiver regarding same.	3.00
	LMS	Confer with Receiver regarding status of Chase Bank response; Review messages and return calls to investors	1.00
	PKJ	Conduct research regarding validity of previous pro hac vice admission in Southern District of New York; contact SDNY court clerk for purpose of finding Kelly Crawford's previous e-filing credentials for the Court; contact Western District of Oklahoma for purpose of determining status of filing of 28 USC 754 Notice.	1.25

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		Hours
	PCL Review file and related communications with K. Crawford and/or R. Spears regarding receivership orders, [REDACTED] responses and obligations under subject orders; communications with K. Crawford regarding BOA turnover status, potential show cause filing issues and related communications to BOA general counsel regarding same; communications with [REDACTED] regarding transmittal of purchase/insurance documents for MB G63; communications with S. Jarvis, K. Crawford, W. Hester regarding appointment for appraisal of Patek branded watches.	4.00
	PCL Communications with [REDACTED] regarding transmittal of purchase/insurance documents for MB G63(.50);communications with S.Jarvis, K. Crawford, W. Hester regarding appointment for appraisal of Patek branded watches.	1.00
	KEW Telephone interviews with former employees regarding compensation structure.	1.50
10/17/2020	PCL Communications with K. Crawford regarding meeting for appraisal of Patek branded watches; Review documents received regarding MB G 63, et al., and Asher and Batashvili sworn statements and related communications with K. Crawford and file review;communications with K. Crawford regarding storage of office assets; communications with K. Crawford and J. Stafford regarding [REDACTED] receipt of freeze order(.25); communications with K. Crawford and A. Spencer regarding Asher representations in statement regarding MB G 63 and turnover of same; communications with K. Crawford regarding Shelby Cobra.	3.75
10/19/2020	JLR Prepare Notice of Stay and LA County Notice of Stay of Proceedings Form in California civil court case in LA County for Receivership Defendants.	1.50
	JSS Prepare consent language to send to defendants Simon and Asher regarding access to web based corporations [REDACTED], [REDACTED], [REDACTED], draft declarations for each corporation for each defendant regarding same (1.00); preparation for and conference with Receivership counsel team regarding division of work and legal issues to research (.75); prepare notices of stay in newly filed federal matter (.50).	2.25
	JLR Locate outside litigation case of Metals.com in the U.S. District Court of the Central District of California - Western Division - Los Angeles necessary to file Notice of Stay; Review of Local Rules as to filing the Notice of Stay; Confirm Pro Hac Vice Requirement with the Clerk's Office.	1.25
	MKS Emails with support centers to find legal department's contact information; draft and send freeze letters to business entities owned or controlled by Receivership Defendants.	0.70
	WSY Email correspondence with counsel for TriNet regarding outstanding issues not resolved in prior correspondence.	0.30
	MHS Review emails from former employees regarding compensation; emails responding to same; telephone interviews with former employees regarding duties and compensation; review letters to be sent to former employees; review and edit affidavits to be sent to former employees; meeting with Receiver regarding same.	1.75
	PCL Meeting with S. Jarvis of Jarvis Jewelry to obtain appraisal of Patek Phillippe branded watches, review of related appraisal and travel to/from S. Jarvis office	

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		Hours
	and related communications with K. Crawford and/or W. Hester regarding same; meeting with R. House of Deboule Jewelers to obtain second opinion of P. Patek branded watches and follow up communications with K. Crawford and/or W. Hester regarding same.	
LMS	Review messages and return calls to investors	2.00
PKJ	Review local rules in Southern district of New York regarding e-filing for miscellaneous matter for appointment of receiver and attorney admission for purpose of preparing pro hac vice motion and required attachments to same; Review Consent Orders entered as to individual defendants and entity defendants; Prepare revised Notice of Appointment of receiver based on Consent Orders; prepare revised correspondence and compile new exhibits to be attached to revised Notice; prepare pro hac vice motion, declaration of Kelly Crawford to be attached to same and proposed order based on template suggested by Court's local rules.	1.50
PCL	Communications with W. Hester and K. Crawford regarding vehicle/motorcycle license plate check and related file review; Communications with W. Hester and K. Crawford regarding Philadelphia properties research, need for lis pendens notices and related review of search results; communications with K. Crawford, J. Buffa et al. regarding case status and investor communications by Receiver; communications with K. Crawford regarding MB G 63, Batashvili residence issues and 8383 Wilshire status and related file review(.75);communications with K. Crawford and R. Spears regarding receivership orders and [REDACTED] response and related file review; communications with K. Crawford regarding BOA response and review of related motion; communications with [REDACTED] regarding receivership MB G 63 status.	2.50
KEW	Draft form affidavit to be sent to former employees; conference with M. Simon and K. Crawford regarding same; telephone interviews with former employees regarding compensation structure; address letters to former employees.	4.00
WLH	Email communication with Receiver and P. Lewis regarding appraisal of watches; research owner information for Land Rover and Mercedes using Westlaw; conference with Receiver regarding Pennsylvania real properties; research Tower Equity properties using Philadelphia Tax Assessor site; email Philadelphia Tax Assessor for the purpose of getting estimates to file lis pendens for the 17 real properties.	4.00
10/20/2020	WSY Email correspondence with former employees of Receivership Entities and with counsel for TriNet.	0.25
	JSS Attention to communications from Jones Day regarding management conference (.25); telephone conference with co-counsel regarding administrative stay chart from Jones Day in preparation of filing notice of receivership (.50); attention to communication from former employee Dennis B. regarding alleged payment (.25);	1.00
	MHS Emails with former employees [REDACTED] and [REDACTED]; communications with Receiver regarding same; conference with Katherine Whitlock regarding letters to former employees from Receiver.	0.75
	BBN Review status of arbitration proceedings in various states (1.25)	1.25
	LMS Review messages and return calls to investors; Review freeze letters by	

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			Hours
	Margaret Shea; Email correspondence with Receiver and Peter Lewis; Obtain [REDACTED] documents; Assist with compilation of exhibits for show cause order.		
PKJ	Prepare Second Notice of Appointment of Receiver based on new Consent Orders for the Western District of Arkansas for purpose of ensuring there are no jurisdictional issues pursuant to 28 USC 754; communication with Western District of Kentucky regarding confirmation of revised filing date to reflect timely filing as of the date of receipt of Notice of Appointment of Receiver; Contact US District Courts for Nevada, Eastern District of New York, Northern District of Ohio, Eastern District of Pennsylvania, Puerto Rico, Eastern District of Tennessee and District of Columbia for purpose of requesting the Court to change the filing date to accurately reflect filing within deadline of October 1, 2020, pursuant to 28 USC 754 based on the date of receipt of Notice of Appointment of Receiver.	2.25	
PKJ	Review local rules for the Western District of Arkansas for purpose of determining requirements for electronic filing privileges and filing Motion for admission pro hac vice; Prepare Motion for Admission Pro hac Vice for Kelly Crawford and all accompanying documents including declaration of Kelly Crawford and proposed Order based on Court's requirements.	3.25	
PKJ	Review [REDACTED] case and the Court's analysis of [REDACTED] [REDACTED] and review of caselaw relating to [REDACTED] [REDACTED]; confer with James Stafford regarding same.	1.00	
PCL	Communications with K. Crawford, L. Sanderson, et al. regarding BOA issues and strategy, draft letter to general counsel and related review/revisions to show cause motion; communications with W. Hester regarding Lis Pendens filings and related review of Phila. real property records; Finalize [REDACTED] response to R. Spears and related communications with K. Crawford; communications with J. Brandlin and K. Crawford regarding computer storage.	1.75	
KEW	Prepare letters to be sent to former employees.	2.75	
KEW		0.75	
10/21/2020	JSS Communications with Jones Day regarding state court hearing and transfer of case in light of notice of stay; review e-mail communications with former employee regarding demand for payment; draft detailed demand email to Microsoft regarding transferring access to accounts; receipt of Massachusetts discovery documents.	2.00	
WSY	Email correspondence with counsel for TriNet (.25); Review of documents provided by TriNet relevant to compensation of Receivership Entities' employees (.5); Email correspondence with representative from Travelers' Insurance regarding [REDACTED] (.25).	1.00	
MHS	Emails from former employees regarding compensation; emails responding to same; conferences with Katherine Whitlock and Receiver regarding letter and attachments to former employees regarding compensation.	0.50	
LMS	Review messages and return calls to investors	1.25	
PKJ	Prepare Second Notice of Appointment of Receiver for Western District of Oklahoma, compile all exhibits for same and prepare revised cover letter to be included with Notice, pursuant to 28, USC 754 to correct any issues with late filing of Original Notice; prepare Motion for Pro Hac Vice admission and all		

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			Hours
accompanying documents to be filed in the Western District of Arkansas; telephone discussion with the clerk for the Western District of Arkansas regarding same and additional requirements for electronic filing of second Notice of Appointment of Receiver; contact clerks for the Eastern District of New York and Puerto Rico for purpose of requesting change of file date of Notice of Appointment of Receiver to date of receipt; contact Northern District of Ohio and Nevada to confirm change in file date of Notice of based on proof of delivery; update spreadsheet to reflect correct filing dates of 754 Notice and case numbers for same.			3.25
	PCL	Communications with K. Crawford, J. Buffa, A. Spencer, et al. regarding administration motion, review and revise same and/or preparation of order; communications with K. Crawford regarding Lis Pendens form and related review; communications with K. Pergram and K. Crawford regarding 8383 Wilshire lease issues and related file review.	2.25
10/22/2020	MKS	Return calls from investors to answer questions.	0.80
	JSS	Communications with Microsoft and successfully access accounts; communications with former employee [REDACTED] to access dropbox; communications with Receiver regarding same.	2.50
	PCL	Review file and email exchanges with [REDACTED] regarding [REDACTED] investor inquiries and draft detailed response and third request for investor information to Mr. Spears (2.0); telephone conversation with A. Spencer regarding draft of motion for order approving administration and transmit same to A. Spencer (.25); communications with K. Crawford regarding BOA account info status(.50).	2.75
	LMS	Review messages and return calls to investors; confer with Receiver regarding high call volume.	6.00
	WLH	Access Philadelphia real property records for the purpose of researching 17 Philadelphia properties legal descriptions; create Exhibit B documents for each property reflecting the legal description of same to include in Notice of Lis Pendens to be filed as to each property; review email from Philadelphia Tax Assessor providing estimate of cost and address to use for sending Notices of Lis Pendens for filing in the real property records.	4.75
10/23/2020	DKB	Research Philadelphia property records for additional Grantor/Grantee entities of Defendants.	0.25
	JSS	Numerous communications with Receiver and receivership team regarding noncompliance of defendants; revise draft letter to Google in light of their objections to demand letter; draft new revised declarations of consent for defendants in light of counsel for defendants' arguments; continue review of documents received in [REDACTED].	4.50
	MKS	Return calls with investors and take notes.	1.00
	WSY	Confer with representative from [REDACTED] and process for obtaining copies of documents relating to the same.	0.25
	PCL	Review package containing [REDACTED] and transmit same to K. Crawford and related communications regarding same; Multiple communications with K. Crawford and/or A. Spencer regarding motion for administration revisions and finalization, turnover of MBG63 by L. Asher	

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logistics and issues, failure of individual defendants to turnover entities lists, etc.; Additional communications with K Crawford and A. Spencer regarding failure of defendants to provide entities list, related review of motion to show cause prepared by K, Crawford, communications with K. Crawford regarding same and coordinate filing of same; Multiple email and/or lengthy phone conversation with A. Spencer to review his comments to the motion for order to approve administration procedures, revise same and transmit revised draft to A. Spencer and K. Crawford; Multiple communications with D. Saville and K. Crawford regarding location of key to MB G63 and coordination of turnover of MB to Receiver; Email communications with Mr. Spears regarding [REDACTED]

[REDACTED] list review; review Philadelphia real property analysis by W. Hester and update prepared by D. Baxter and related communications with K. Crawford, et al; review of defendant Batashviliran answer and Asher answer and transmit same to K. Crawford; Communications with A. Spencer and related review of consent affidavits and related communications with K. Crawford and J. Stafford regarding same; communications with W. Hester and K. Crawford regarding lis pendens notices for Philadelphia properties.

		Hours
LMS	Return calls to multiple investors; Confer with Margaret Shea regarding questions from investors	6.90
MHS	Telephone conference with [REDACTED], former employee, regarding compensation issues; emails with [REDACTED], former employee, regarding compensation.	1.00
PKJ	Conduct research on issue of whether the Receiver has authority pursuant to receivership order to release of Defendants' electronic communications; from digital cloud providers; contact Eastern District of New York and District Court of Puerto Rico to revise filing date of 754 Notice to accurately reflect date of delivery of filing documents.	0.75
KEW	Telephone conference with former employee.	1.75
		0.25
10/24/2020	MHS Communications with Receiver regarding letters to former employees.	0.25
	For Current Services Rendered	411.90
		117,293.50

## Recapitulation

Timekeeper	Hours	Hourly Rate	Total
Priya K. Jesani	48.95	\$270.00	\$13,216.50
Walker S. Young	16.45	240.00	3,948.00
Margaret K. Shea	21.40	200.00	4,280.00
Brenda Neuwirt	1.25	325.00	406.25
Mark Simon	25.05	435.00	10,896.75
Will Hester	32.75	125.00	4,093.75
Leslie Sanderson	47.65	305.00	14,533.25
Deb Baxter	0.25	150.00	37.50
Jessica L. Rolls	8.50	200.00	1,700.00
Jane Taber	1.60	425.00	680.00
James Stafford	59.25	300.00	17,775.00
Katherine Whitlock	14.90	200.00	2,980.00
Tiffany Hykeski	50.00	125.00	6,250.00
Peter Lewis	83.90	435.00	36,496.50

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09/28/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/28/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/28/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/28/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/28/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/28/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/28/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/28/2020	Postage*	11.75
09/28/2020	Courier service (670) Special Delivery Service, Inc.	12.32
09/28/2020	Courier service and document production (670) Special Delivery Service, Inc.	228.25
09/28/2020	Shipping cost/ THE BOX DEPOT (KMC Firm CC)	1,466.47
09/29/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/29/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/29/2020	Filing fee (3988) U.S. District Court Clerk	47.00
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09/29/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/29/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/29/2020	Filing fee (3988) U.S. District Court Clerk	47.00
09/29/2020	Overnight Delivery - Clerk of the Court Virgin Islands (1) Federal Express	96.46
09/29/2020	Overnight Delivery - Clerk of the Court Puerto Rico (1) Federal Express	68.72
09/29/2020	Overnight Delivery (1) Federal Express	205.47
09/29/2020	Overnight Delivery (1) Federal Express	5,822.02
09/29/2020	Filing fee / COURTS/USDC-UT-TL (KMC Firm CC)	47.00
09/30/2020	Filing fee / COURTS/USDC WY-S (KMC Firm CC)	47.00
09/30/2020	Filing fee /COURTS/USDC-AL-S-T (KMC Firm CC)	47.00
10/01/2020	Filing fee/COURTS/USDC-TX-N-PG (KMC Firm CC)	19.00
10/02/2020	Filing fee /COURTS/USDC-WA-W-S (KMC Firm CC)	47.00
10/02/2020	Insurance coverage / GEICO (KMC Firm CC)	1,572.08
10/05/2020	Overnight Delivery (1) Federal Express	40.30
10/05/2020	Overnight Delivery (1) Federal Express	264.78
10/05/2020	Computerized legal research	470.00
10/05/2020	Postage	1.80
10/06/2020	Overnight Delivery - Qty 5 (1) Federal Express	164.78
10/07/2020	Overnight Delivery (1) Federal Express	43.75
10/09/2020	Overnight Delivery (1) Federal Express	39.62
10/14/2020	Service of Process (9999) Clerk, District Court of Guam	47.00
10/15/2020	Postage	0.50
10/16/2020	Postage	250.00
10/17/2020	Postage	89.00
10/18/2020	Postage	13.00
10/20/2020	Business meals - Per diem 3 days JSS	198.00
10/20/2020	Business meals - Per diem 3 days WSY	198.00
10/20/2020	Business meals - Per diem 3 days WHH	198.00
10/20/2020	Business meals - Per diem 3 days PCL	198.00
10/20/2020	Postage	3.00
	<b>Total Expenses</b>	<b>21,737.58</b>
	<b>Total Current Services and Expenses</b>	<b>139,031.08</b>

**EXHIBIT C**

**Fees and Expenses of Brandlin & Associates**

**September 22, 2020 through October 24, 2020**



**BRANDLIN**  
AND ASSOCIATES

**INVOICE**

Date: November 3, 2020

Mr. Kelly Crawford  
Scheef & Stone  
500 North Akard Street  
Suite 2700  
Dallas, TX 75201

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**Re: Commodity Futures Trading Commission, et al v. TMTE, et al**

For services rendered from inception through October 25, 2020 –  
(please see attached details of charges).

## Scheef &amp; Stone

Commodity Futures Trading Commission, et al v. TMTE, et al  
Detail Charges from Inception Through October 25, 2020

	Date	Time	Rate	Total
Meeting at TMTE offices with Kelly Crawford, Peter Lewis & Will Hester, etc. Review of CFO's offices. Contact with P/R servicer TriNet. Various PCW Adam Hunt, Sherry & Alicia Roth at TriNet. Attempts to get TMTE's EIN from TriNet & to stop payroll for Defendant Simon Batashvili. Prep engagement letter	9/24/2020	3.10	395	\$ 1,224.50
Worked with May Ng, Gerardo Castellanos & Rick Arbuckle to set up accounts at EastWest. Completion of W-9 & Certificate of Beneficial Ownership. Various attempts to secure a EIN for the Receivership to open the bank accounts.	9/24/2020	3.60	395	\$ 1,422.00
Researched Form SS-4 Requirements related to EIN request. Coordinated with client for proper completion of Form SS-4 and attempted to apply for Receivership EIN via IRS online portal.	9/25/2020	2.30	250	\$ 575.00
Review of Order Granting ex parte motion appointment of Receiver, etc. Follow up on EIN with Bob Mosier; various emails from Kelly & f/u with former employees;	9/28/2020	2.20	395	\$ 869.00
Attempted numerous times to submit EIN request for Chase Metals Receivership via IRS online portal. Researched failed online attempts and eventually spoke to IRS help desk and was notified that the IRS system would not allow requests at this time. Contacted Bob Mosier for guidance and discussed other proposed methods of obtaining EIN. Communications with Jeff Brandlin regarding status.	9/28/2020	3.20	0	\$ -
Meeting at 8383 with former employees to retrieve their personal belongings; p/u mail & packages; various PCW Kelly Crawford re status & direction; inspect parking garage & 7th floor storage units with bldg. mgmt.; mtg with [REDACTED] re TriNet payroll service & PW's for QB files.	10/1/2020	4.50	395	\$ 1,777.50
Conducted onsite procedures at 8383 Wilshire Blvd, met with Chase Metals ex-employees, including [REDACTED], and others. Discussed outstanding payroll for the 4 day period ended 9/24/20 with [REDACTED] and Trinet. Discussed various issues with trying to gain access to QuickBooks. Toured office suites #700 and #742, as well as 2 onsite storage units, accompanied by onsite property manager and facilities personnel. Picked up mail and obtained copies of keys to all suites/units. Coordinated delivery of mail to Dallas, TX. Discussed next steps with J. Brandlin.	10/1/2020	2.60	100	\$ 260.00
Communications with Darren Saville regarding visit to Lucas Asher's home rental located at 10134 Angelo View Dr. Researched availability of storage facilities in Beverly Hills area, as well as of truck rentals/hired help. Scheduled with Darren Saville to arrive Asher residence at 9:30 AM to pick up items and transfer them into a public storage facility.	10/1/2020	2.60	100	\$ 260.00
Arrange to have Shelby Mustang & MBZ towed from 8383 to 12100, Various PCW's with Kelly Crawford & Gerardo Castellanos & Diego Mancilla at 12100 re spaces, tow truck clearances, etc..	10/2/2020	1.70	395	\$ 671.50
Met with Simon Batashvili representative to retrieve Shelby Cobra. Coordinated with Tow Truck company in order to tow vehicle to 12100 Wilshire Blvd parking facility (included 1+ wait time). Held various discussions with J. Brandlin and K. Crawford regarding status of seizure, as well as other vehicle (Mercedes Benz). Followed tow truck to 12100 Wilshire Blvd. and allowed them access to parking garage for proper storage of vehicle on level P2.	10/4/2020	4.70	100	\$ 470.00

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Follow up on Shelby Mustang. Physically inspect it. Coordinate with Gerardo Castellanos info to Kelly. Set up storage for Asher's personal items.	10/5/2020	2.20	395	\$ 869.00
Discussions with Kelly Crawford regarding Shelby Cobra paperwork (Ownership/Title), storage location, etc., and the possibility of other vehicles to be confiscated.	10/5/2020	0.20	100	\$ 20.00
Review extension of Receiver order. Travel to 8383 to meet with former employees; pick up mail & packages; inspect satellite suites; investigate satellite storage areas 8383; meet with office of building; meet with [REDACTED] re payroll & TriNet data.	10/6/2020	5.25	169.25	\$ 888.56
Met with Chase Metals [REDACTED] and [REDACTED]s. Accessed TriNet HR portal and downloaded various Payroll/HR reports. Assisted [REDACTED] in preparing a simulated payroll run related to the 4-day pay period ended 9/24/20. Summarized results and discussed with J. Brandlin.	10/6/2020	4.10	100	\$ 410.00
Met with Chase Metals ex-employee [REDACTED] at 8383 Wilshire. Supervised the ex-employee's removal of personal belongings, documented items, and answered their general questions/concerns. Picked up mail/packages related to 8383 Wilshire and coordinated delivery to Dallas, TX.	10/6/2020	3.20	100	\$ 320.00
Review TriNet payroll data; calc the 9/24 PR for all 5 companies; obtain census data from TriNet; propose adjustments for [REDACTED] additional hours; eliminate sales people, duplicate payments, etc. Follow up on Jeff Kohn & bookkeeping services.	10/7/2020	3.75	395	\$ 1,481.25
F/U w/ Jeff Kohn & QB's PW.	10/7/2020	1.40	395	\$ 553.00
Performed additional vetting of Employee Payroll Analysis prepared for the 4-day pay period ended 9/24/20. Documented all assumptions included therein, calculation details, and assessed reasonableness of calculated compensation (by individual employee/company, compared figures to prior periods). Held discussions with J. Brandlin.	10/7/2020	3.60	250	\$ 900.00
Answered questions related to the detailed payroll review performed by J. Brandlin. Incorporated various revisions to the payroll figures based on updated assumptions. Discussed data contained within the Employee Census and additional requests associated with such data.	10/7/2020	1.70	250	\$ 425.00
Held discussions with Chase Metals bookkeeper Jeff Kohn regarding the recent developments at the Company. Discussed the need to obtain access to Chase Metal's (and related entities) QuickBooks accounts and to obtain answers to various questions. Provided status update to Jeff Brandlin and Kelly Crawford.	10/7/2020	2.10	250	\$ 525.00
F/U with Kelly re PayPal, banking, other sets of books, investigatory conversations with [REDACTED].	10/8/2020	3.20	395	\$ 1,264.00
Reviewed Employee Census Information, as downloaded from TriNet, related to the five relevant entities (Revo, Retirement Insider, Chase Metals, FAET, and Tower Equity). Organized data and highlighted key information in order to facilitate employee correspondence. Traced employees included in final payroll run to employee census as to ensure proper inclusion/exclusion of individuals. Held discussions with J. Brandlin and K. Crawford.	10/8/2020	3.60	250	\$ 900.00

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	Date	Time	Rate	Total
Met with Chase Metals ex-employees [REDACTED] at 8383 Wilshire. Supervised the ex-employee's removal of personal belongings, documented items, and answered their general questions/concerns. Picked up mail/packages related to 8383 Wilshire and coordinated delivery to Dallas, TX. Communications with Walker Young regarding mail contents.	10/8/2020	4.20	100	\$ 420.00
Entry into QB's ; PCW Jeff Kohn. F/U Calls with Gerardo re summary of results & review & forward to Kelly with analysis. F/U with TriNet	10/9/2020	2.70	395	\$ 1,066.50
F/U on teams for 8383 move.	10/9/2020	0.75	0	\$ -
F/U with Walker young regarding employees at haven't been paid Follow up with Kelly regarding PW for QB's. Detail P/R, review with Kelly. F/U on Walker Youngs questions on 5 employees P/R.	10/12/2020	1.20	395	\$ 474.00
Coordinate & supervise move & consolidation of offices at 8383	10/13/2020	5.60	100	\$ 560.00
F/U with ex employee [REDACTED]	10/13/2020	0.20	395	\$ 79.00
Communications with Chase Metals Bookkeeper Jeff Kohn regarding obtaining access to client's QuickBooks files.	10/13/2020	2.50	250	\$ 625.00
Met with Chase Metals ex-employee [REDACTED]. Supervised the ex-employee's removal of personal belongings, documented items, and answered their general questions/concerns. Searched offices/desks for manual Employee Checks that had yet to be distributed to employees. Picked up mail/packages related to 8383 Wilshire and coordinated delivery to Dallas, TX.	10/13/2020	3.25	100	\$ 325.00
Coordinate & supervise move & consolidation of offices at 8383. Review of pivot table for Bank of America #4024 cash account for the years of 2017 through 2020, evaluated & analyzed/categorized results, and discussed results with Gerardo Castellanos. Forward results to Kelly.	10/14/2020	6.20	395	\$ 2,449.00
Telephonic meeting with Chase Metals bookkeeper Jeff Kohn, self, and Jeff Brandlin. Discussions included background of Kohn's role as the outside accountant, types of accounting duties performed, nature of the company's accounts, features of QuickBooks Online, etc.	10/14/2020	1.75	250	\$ 437.50
Downloaded various excel-based reports from Chase Metals QuickBooks Online software, including back-up copies of General Ledger and Audit Trail Reports. Perused BofA #4024 PDF Bank Statements and American Express #1003 PDF Credit Card Statements. Prepared pivot table for Bank of America #4024 cash account for the years of 2017 through 2020, analyzed/categorized results, and discussed results with J. Brandlin.	10/14/2020	4.75	250	\$ 1,187.50
Extensive discussions with ex-Chase Metals Controller [REDACTED] regarding the nature of the Company's operations, bank account activities (B of A #4024 and PayPal), chronology of events, and related accounting journal entries (as per QuickBooks download files). Prepared memorandum and discussed notes with J. Brandlin.	10/14/2020	2.75	250	\$ 687.50
Met with Chase Metals ex-employee [REDACTED]. Supervised the ex-employee's removal of personal belongings, documented items, and answered their general questions/concerns. Searched offices/desks for manual Employee Checks that had yet to be distributed to employees. Held discussions with Property Manager. Took a rough inventory of the number of computers, by office suite. Picked up mail/packages related to 8383 Wilshire and coordinated delivery to Dallas, TX.	10/15/2020	4.25	100	\$ 425.00

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	Date	Time	Rate	Total
Assemble team & coordinate the packaging, removal & storage of ~ 150 computers; office furniture, TV's, clear extra office space & storage areas, etc.	10/19/2020	3.75	100	\$ 375.00
Discussions with J. Brandlin regarding the removal of all 100+ Apple I-Mac computers and other assets from 8383 Wilshire location and their transfer into storage. Researched options/prices related to packing materials, boxes, transportation vehicles, labor rates, storage units, etc. Held various discussions with J. Brandlin and devised the proper plan.	10/19/2020	4.20	100	\$ 420.00
Coordinate & supervise move & consolidation of offices at 8383	10/20/2020	6.70	100	\$ 670.00
Drove to Home Depot to purchase packing materials, moving supplies, etc., in conjunction with the transfer of Apple I-Mac Computers and other equipment from 8383 Wilshire into storage.	10/20/2020	2.25	100	\$ 225.00
Drove to Home Depot to purchase additional packing materials, moving supplies, etc., in conjunction with the transfer of Apple I-Mac Computers and other equipment from 8383 Wilshire into storage.	10/21/2020	1.75	100	\$ 175.00
Managed and participated in the packaging of 150+ Apple computers. Coordinated labor usage and supervised 3 individuals.	10/21/2020	9.20	100	\$ 920.00
Managed and participated in the packaging, loading, and transfer of 150+ Apple I-Mac computers into storage. Coordinated labor usage and supervised 7 individuals.	10/22/2020	8.90	100	\$ 890.00
Managed and participated in the dismantling, packaging, loading, and transfer of a total of 17 75" TV's, 40+ computer monitors, and other large/bulky items into storage. Coordinated labor usage and supervised 7 individuals. Picked up mail/packages related to 8383 Wilshire and coordinated delivery to Dallas, TX.	10/23/2020	8.70	100	\$ 870.00
		150.35		\$ 29,366.31
Blended Rate		150.35		\$ 195.32
Summary by Professional:				
			Fees at Standard Rates	
			Hours	Rate / Hour
Jeffrey E. Brandlin		55.00	\$ 595	\$ 32,725.00
Gerardo Castellanos		96.25	\$ 375	\$ 36,093.75
Blended Rate @ Standard		151.25	\$ 455	\$ 68,818.75
				\$ 455.00